

Adam P. Segal, Esq., Nevada Bar No. 6120  
Christopher M. Humes, Esq., Nevada Bar No. 12782  
BROWNSTEIN HYATT FARBER SCHRECK, LLP  
100 North City Parkway, Suite 1600  
Las Vegas, Nevada 89106-4614  
Telephone: (702) 382-2101  
Facsimile: (702) 382-8135  
Email: [asegal@bhfs.com](mailto:asegal@bhfs.com)  
[chumes@bhfs.com](mailto:chumes@bhfs.com)

*Attorneys for Creditors, Trustees of the Construction Industry  
and Laborers Joint Trust Funds*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re:

## SIX STAR CLEANING AND CARPET SERVICES, INC.,

Case No. BK-S-13-18735-MKN

Chapter 7

**RESPONSE TO APPLICATION TO  
EMPLOY PRAEMIA LAW, PLLC AS  
SPECIAL LITIGATION COUNSEL  
FOR LENARD SCHWARTZER,  
CHAPTER 7 TRUSTEE (ECF NO. 313)**

Creditors, the Trustees of the Construction Industry and Laborers Joint Trust Funds (the “Trust Funds”), by and through their counsel of record, Adam P. Segal, Esq. and Christopher M. Humes, Esq., hereby file this Response to the Application to Employ Praemia Law, PLLC as Special Litigation Counsel For Lenard Schwartzter, Chapter 7 Trustee (the “Application”) (ECF No. 313).

Recently, the Trust Funds objected to the Debtor's continued efforts in aggressively litigating the case *Collins et al v. Laborers International Union of North America Local No 872 et al.*, 2:11-cv-00524-GMN-DJA, when the case has persisted for a decade. See (ECF No. 312). Now, the Trustee has filed the Application to employ Praemia Law to continue the above-referenced litigation.

The Trust Funds file this Response in order to reserve all rights to object to any disbursement of attorney's fees and litigation costs from the estate, subject to the restrictions outlined in the Bankruptcy Code. The Trust Funds specifically note that the 50% contingency fee arrangement is

1 likely unreasonable, given the standard contingency fees in Nevada, and the amount of work likely  
2 remaining in the above-referenced litigation.

3 Based on the foregoing, the Trust Funds also respectfully request that they have 5 business  
4 days to respond to any application to compensate Special Litigation Counsel, should the Court  
5 decide to grant the instant Application.

6 Dated: May 11, 2021.

**BROWNSTEIN HYATT FARBER SCHRECK, LLP**

7 /s/ Christopher M. Humes

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8 Adam P. Segal, Esq., Nevada Bar No. 6120  
9 Christopher M. Humes, Esq., Nevada Bar No. 12782  
10 100 North City Parkway, Suite 1600  
11 Las Vegas, Nevada 89106-4614  
Telephone: (702) 382-2101  
Facsimile: (702) 382-8135

12 *Attorneys for Creditors, Trustees of the Construction  
Industry and Laborers Joint Trust Funds*

**CERTIFICATE OF SERVICE**

I certify that I am an employee of Brownstein Hyatt Farber Schreck, LLP and that on May 11, 2021, I served a true copy of the foregoing **RESPONSE TO APPLICATION TO EMPLOY PRAEMIA LAW, PLLC AS SPECIAL LITIGATION COUNSEL FOR LENARD SCHWARTZER, CHAPTER 7 TRUSTEE (ECF NO. 313)** via CM/ECF System and E-Service upon:

Dan M. Winder  
3507 W. Charleston Blvd.  
Las Vegas, NV 89102  
[winderdandocket@aol.com](mailto:winderdandocket@aol.com)

Attorney for Debtor, Six Star Cleaning and Carpet Services, Inc.

Jacob L. Houmand, Esq,  
Houmand Law Firm LTD.  
9205 W. Russell Rd., Bldg 3, Suite 240  
Las Vegas, NV 89148  
[jhoumand@houmandlaw.com](mailto:jhoumand@houmandlaw.com)  
Attorney for Trustee, Lenard Schwartzzer

U.S. Trustee  
300 Las Vegas Blvd., So. Suite 4300  
Las Vegas, NV 89101

b. **BY U.S. MAIL** upon:

Abingdon Business Capital  
900 East Hamilton Ave., Suite 100  
Campbell, CA 95008

Allied Collection Services  
Acct No 2467868-1  
3080 S. Durango Dr., Suite 208  
Las Vegas, NV 89117

CENTURY LINK  
Acct No 309584889  
P.O. BOX 2961  
Phoenix, AZ 85062

**Clark County Assessor's Office  
Attn Bankruptcy Clerk**

1 500 S Grand Central Pkwy  
2 Las Vegas NV 89155  
3 Cox Communications  
4 Acct No 0018610088739103  
5 PO Box 53262  
6 Phoenix, AZ 85072  
7 Dept Employment, Training & Rehab  
8 Employment Security Division  
9 500 East Third St  
10 Carson City, NV 89703-0030  
11 Dept. of Employment, Training & Rehab  
12 Acct No 260055  
13 Employment Security Division  
14 500 East Third St.  
15 Las Vegas, NV 89173  
16 Dept. of Taxation  
17 Acct No 9125  
18 2550 Paseo Verde Pkwy. #180  
19 Henderson, NV 89074  
20 Eagle Graphic Systems, Inc. dba Signs Now  
21 6290 S. Pecos Rd. Suite 600  
22 Las Vegas, NV 89120  
23 Financial Corporation  
24 Acct No 1997505-1  
25 PO Box 20350  
26 Austin, TX 78720  
27 H&E Equipment  
28 Acct No 1027612  
11100 Mead Road #200  
Baton Rouge, LA 70816  
Internal Revenue Services  
Acct No 2792  
PO Box 1485566  
Cincinnati, OH 45250  
Moneytree  
Acct No SF000337  
PO Box 58363  
Seattle, WA 98138  
NCO Financial Systems  
Acct No 9103

1           507 Prudential Road  
2           Horsham, PA 19044  
3  
4           Nevada Department of Taxation  
5           Bankruptcy Section  
6           555 E. Washington #1300  
7           Las Vegas NV 89101  
8  
9           Nevada Energy  
10          Acct No 3000272011519154285  
11          PO Box 30086  
12          Reno, NV 89520  
13  
14          Nvenergy  
15          C/O Credit Bureau Central  
16          Po Box 29299  
17          Las Vegas, NV 89126  
18  
19          Perini Building Company  
20          Acct No mccarrant3  
21          5871 Spencer Street  
22          Las Vegas, NV 89119  
23  
24          Rapid Cash  
25          Acct No 0050-P-001631086  
26          3611 North Ridge Road  
27          Wichita, KS 67205  
28  
29          Signs Now  
30          Acct No sixstar  
31          6290 S. Pecos Rd. #600  
32          Las Vegas, NV 89120  
33  
34          Southwest Linen Company  
35          Acct No 8315  
36          6335 Sunset Corporate Dr.  
37          Las Vegas, NV 89120  
38  
39          Staples  
40          Acct No 8315  
41          PO Box 689020  
42          Des Moines, IA 50368  
43  
44          Sunbelt Rentals  
45          Acct No 528139  
46          PO Box 409211  
47          Atlanta, GA 30384  
48  
49          Sundance Plaza LLC  
50          Acct No 3530301

1           6725 Via Austi Parkway #380  
2           Las Vegas, NV 89119

3           Sunset Business Park, LLC  
4           Acct No A-13-678669  
5           625 S. Eighth St.  
6           Las Vegas, NV 89101

7           Tower Group Companies  
8           Acct No wcn0001529  
9           PO Box 2474  
10          Eagle, ID 83616

11          United Temps  
12          Acct No sixstar  
13          1550 South Indiana #300  
14          Chicago, IL 60605

15          US Bank N.A.  
16          Bankruptcy Department  
17          PO BOX 5229  
18          Cincinnati, Ohio 45201-5229

19          US Bank National Assoc  
20          Acct No 0249  
21          PO Box 5227  
22          Cincinnati Ohio 45202

23          **I declare under penalty of perjury that the foregoing is true and correct.**

24          \_\_\_\_\_  
25          /s/ Ebony Davis

26          \_\_\_\_\_  
27          An Employee of Brownstein Hyatt Farber Schreck, LLP